

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE:) **CASE NO: 18-46969-399**
JOHN EDWARD HANNA II) **Chapter 13**
))
) **Trustee's Objection to Confirmation**
) **Original Confirmation Hearing set for:**
Debtor) **January 9, 2019 9:00 am**

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The plan is not proposed in good faith (11 U.S.C. § 1325(a)(3)) because:
Debtor can afford a plan payment of \$1,999 per month and maintains high expenses of \$7,367 per month for three people, but proposes a payment of only \$750. Debtor is able to pay the guaranteed 100% to all creditors much sooner than the proposed 60 months.
2. Schedule A lists real estate owned as tenants by the entireties, but: (a) Debtor is not married. (b) Debtor believes the real estate was foreclosed.
3. The Trustee requires a copy of the declarations page or pages for Debtor's life insurance policies.
4. Schedule B fails to provide the value of Debtor's whole life insurance policy.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: December 12, 2018

OBJCONFAF--DSD

/s/ Diana S. Daugherty
Diana S. Daugherty
Standing Chapter 13 Trustee
P.O. Box 430908
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trust33@ch13stl.com

18-46969-399

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12/12/2018

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on December 12, 2018, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on December 12, 2018.

JOHN EDWARD HANNA II
103 EAST JEWEL AVE
SAINT LOUIS, MO 63122

/s/ Diana S. Daugherty
Diana S. Daugherty